

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL FOUR)

)
) Docket No. RM2016-12

**ANSWER OF AMAZON FULFILLMENT SERVICES, INC.,
IN SUPPORT OF POSTAL SERVICE MOTION
FOR EXTENSION OF TIME FOR REPLY COMMENTS**

(October 26, 2016)

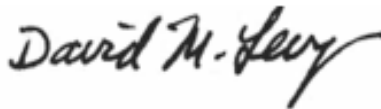
Amazon Fulfillment Services, Inc. ("AFSI") supports the October 24, 2016 motion of the United States Postal Service to extend the current deadline for reply comments (October 31) by two weeks, to November 14, 2016. The computer programs and data underlying the studies and models, which were not fully posted on the Commission's website even in redacted form until after 6 p.m. on October 18, are too voluminous to be tested and reviewed properly before November 14.

The Monte Carlo simulation study sponsored by UPS witnesses Neels and Powers is particularly intricate and detailed. The study purports to simulate the daily workings of a hypothetical postal system to generate data that Drs. Neels and Powers use in the statistical analyses that they sponsor in their report. The simulated postal system includes 500 simulated locations organized into 10 zones, and models both daily intra-zone and inter-zone mail flows between all points in the system over a six year period. Over 1000 lines of computer code, written in

two different languages (R and Stata), are used to implement these simulations and the statistical analyses that rely on them. This is a large amount of code to scrutinize and verify. Further, the experts engaged by AFSI to review this work, a team of econometricians at Bates White Economic Consulting, estimate that the programs that create the simulated data alone take approximately 19 hours to run from start to finish on modern computer hardware. The time needed for even a single run of the full simulation model makes even minor adjustments to it time-consuming to test.

Finally, the head of the Bates White team, T. Scott Thompson, will be unavailable from November 5 through 7 because of previous commitments that were made when the filing deadline for reply comments was October 21. See Order No. 3482 at 3.

Respectfully submitted,

A handwritten signature in black ink that reads "David M. Levy". The signature is written in a cursive, flowing style.

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October 26, 2016